

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: MIKE SABRI DANIEL)	Case No. 08-32942-DOT
)	Chapter 7
and)	
)	
NATALY NAJIB DANIEL)	
)	
Debtors.)	
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MOTION FOR SHOW CAUSE ORDER

COMES NOW, Roy M. Terry, Jr., Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of Mike Sabri Daniel and Nataly Najib Daniel (the “Debtors”), and files this motion pursuant to Bankruptcy Rule 9020 asking that the Court require the Debtors to show cause why an order should not be entered finding the Debtors in civil contempt of court and entering sanctions thereon, and in support of such motion states as follows:

1. On June 26, 2008 (the “Petition Date”), the Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. On July 1, 2010 the case was converted to a Chapter 7 bankruptcy.
3. Roy M. Terry, Jr. was appointed as Interim Chapter 7 Trustee and continues to serve in that capacity.
4. The § 341 Meeting of Creditors in this matter was held on August 10, 2010, adjourned to September 20, 2010 and adjourned to October 26, 2010.
5. On July 4, 2010, the Court entered its Order to Debtors, which orders the Debtors, in relevant part:

Roy M. Terry, Jr., VSB No. 17764
DuretteBradshaw PLC
P.O. Box 2188
Richmond, VA 23218-2188
Chapter 7 Trustee

You shall preserve all recorded information, including books, documents, records and papers, from which your financial condition . . . might be ascertained and make the same available to the . . . Trustee when requested to do so.

You shall cooperate with the Trustee as is necessary to enable the Trustee to perform the Trustee's duties as required by law.

See Order to Debtor(s), Docket No. 71.

6. The Trustee has requested copies of bank statements as of the Petition Date for all accounts open on the Petition Date.

7. The Debtors have refused to provide the Trustee with the requested documents.

8. By (1) refusing to provide the Trustee with all necessary information regarding their assets and (2) failing to cooperate with the Trustee, the Debtors have failed and refused to perform the obligations imposed upon them by this Court's Order to Debtor entered July 4, 2010.

WHEREFORE, the Chapter 7 Trustee respectfully requests entry of an order directing the Debtors to appear before the Court and show cause why, if the allegations of the Motion are proven, they should not be held in civil contempt of this Court, and granting such other and further relief as the Court deems proper.

Respectfully submitted, this the 7th day of October, 2010.

/s/ Roy M. Terry, Jr.
Roy M. Terry, Jr., VSB No. 17764
DuretteBradshaw PLC
P.O. Box 2188
Richmond, VA 23218-2188
Chapter 7 Trustee

Certificate of Service

I hereby certify that on the 7th day of October, 2010, a true copy of the foregoing Motion was delivered by electronic means and/or mailed first class mail, postage fully prepaid, to the following:

Mike Sabri Daniel &
Nataly Najib Daniel
9532 Pine Trails Ct.
Richmond, VA 23294

Mitchell Goldstein
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1650 Willow Lawn Drive
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Richmond, VA 23230
Counsel to the Debtor

Robert B. Van Arsdale
Office of the United States Trustee
701 E. Broad Street, Room 4304
Richmond, VA 23219

/s/ Roy M. Terry, Jr.